

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (RCC) ECF Case
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This document relates to:

Thomas E. Burnett, Sr., et al. v. Al Baraka Investment & Development Corp., et al., Case No. 03-CV-9849 (S.D.N.Y.)

Kathleen Ashton, et al. v. Al Qaeda Islamic Army, et al., Case No. 1:02-6977 (S.D.N.Y.)
Federal Insurance Co., et al. v. Al Qaida, et al., Case No. 03-CV-6978 (S.D.N.Y.)

Continental Casualty Co., et al. v. Al Qaeda Islamic Army, et al., Case No. 04-CV-05970-UA (S.D.N.Y.)

Euro Brokers, Inc., et al. v. Al Baraka Investment and Development Corp., et al., Case No. 04-CV-07279-UA (S.D.N.Y.)

New York Marine and General Insurance Co. v. Al Qaida, et al., Case No. 04-CV-6105 (S.D.N.Y.)

World Trade Center Properties, LLC, et al. v. Al Baraka Investment and Development Corp., et al., Case No. 04-CV-7280 (S.D.N.Y.)

AFFIDAVIT OF EULALIO DELA PAZ

I, Eulalio Dela Paz, declare under penalty of perjury as follows:

1. I was born in the Philippines on February 12, 1952. I am a citizen of the Republic of the Philippines and reside there in the town of President Roxas.

2. I was employed by the Mohammad Binladin Company and the Mohammad Binladin Establishment (collectively for ease of reference "MBC") in Jeddah, Saudi Arabia, from 1979 until late 2001. During my tenure at MBC, I worked in the services office, which was an office established to provide various services, including travel-related services, to MBC employees and to members of the Binladin family.

3. My responsibilities at the services office included obtaining visas for MBC employees and for members of the Binladin family. During busy periods, such as the summer, the services office handled as many as 20 to 25 visa applications per day.

4. In my capacity as an employee of the services office, I handled the preparation and submission of a visa application for Mohammad Jamal Khalifa to the U.S. consulate in Jeddah. Although I do not recall the specific date, I have been informed that, according to public records, the visa was issued by the U.S. Consulate in early August 1994. That time frame is consistent with my general recollection of events. I recall that Mr. Khalifa's wife, Sheikha Binladin, sent Mr. Khalifa's passport to the MBC office for assistance in obtaining a visa for her husband. Sheikha Binladin is one of the daughters of Mohammad Awad Binladin and, as a member of the Binladin family, she was entitled to request the assistance of the services office for family travel.

5. I had no contact with Mr. Khalifa in connection with this visa application and, in fact, I have only ever met Mr. Khalifa on one occasion when I assisted his family in transporting luggage to the airport in connection with a family trip.

6. Using Mr. Khalifa's Saudi passport, I obtained the information needed to prepare the visa application. I was not aware that Mr. Khalifa carried a passport from any other country, and was under the impression that Mr. Khalifa was in Saudi Arabia at the time the application was made.

7. As was my regular practice, I listed the MBC post office address on Mr. Khalifa's visa application. There were no residential addresses in common usage in Jeddah at that time, so I routinely used MBC's post office address on the visa applications that I prepared. The fact that

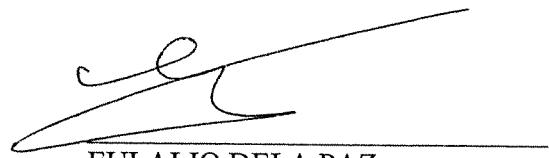
this was a business P.O. Box, and not a residential address, was obvious on the face of the application.

8. After completing the visa application, I took it, along with Mr. Khalifa's passport and a photograph, to the U.S. Consulate, which issued the visa the same day. The U.S. Consulate staff was aware that I was preparing visa applications for other people, as I expressly discussed that fact with a member of the Consulate staff, Jamal Aliya, in the mid-1990's. Mr. Aliya did not indicate any concerns about the procedures I was following.

9. At the time Mr. Khalifa's visa application was prepared and submitted, I had no knowledge that he was alleged to have been involved in terrorist acts in Jordan or anywhere else in the world. I had never heard of al Qaeda at that time, and I had no knowledge that Mr. Khalifa had any alleged ties to that or any other terrorist organization.

10. I do not recall ever handling any travel arrangements for Osama Bin Laden, his spouses or children.

Republic of the Philippines)
City of Manila) SS
Embassy of the United States of America)



EULALIO DELA PAZ

Sworn to before me this
1st day of November, 2005
December, 2005 by**EULALIO DELA PAZ**

Timothy P. Buckley **TIMOTHY P. BUCKLEY**
Notary Public **Vice Consul**
My Commission Expires United States of America **INDEFINITE**
COMMISSION